

Mark David Goss

Member

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July 28, 2011

Via Hand-Delivery

Mr. Jeff Derouen Executive Director Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602

Re: PSC Case No. 2011-00148

Dear Mr. Derouen:

RECEIVED

JUL 28 2011

PUBLIC SERVICE COMMISSION

Please find enclosed for filing with the Commission in the above-referenced case, an original and ten redacted copies of the responses of East Kentucky Power Cooperative, Inc., ("EKPC") to the Commission Staff's Information Request from the Informal Conference held on July 19, 2011. Also enclosed are an original and ten copies of EKPC's Petition for Confidential Treatment of Information ("Petition") regarding the response to Request 1. One unredacted copy of the designated confidential portion of the response to Request 1, which is the subject of the Petition, is enclosed in a sealed envelope.

Additionally, please find enclosed an original and ten copies of the response of Shelby Energy Cooperative, Inc. to the Commission Staff's Information Request from the Informal Conference held on July 19, 2011.

Very truly yours,

Mark David Goss
Mark David Goss

Counsel

Enclosures

RECEIVED

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

JUL 28 2011

IN THE MATTER OF:

PUBLIC SERVICE COMMISSION

THE FILING OF NEW DEMAND SIDE)	
MANAGEMENT TARIFFS BY EAST KENTUCKY)	CASE NO.
POWER COOPERATIVE, INC. AND 11 OF ITS)	2011-00148
MEMBER DISTRIBUTION COOPERATIVES)	

PETITION FOR CONFIDENTIAL TREATMENT OF INFORMATION

Comes now the petitioner, East Kentucky Power Cooperative, Inc. ("EKPC") and, as grounds for this Petition for Confidential Treatment of Information (the "Petition"), states as follows:

- 1. This Petition is filed in conjunction with the filing of certain information in its response to Request 1 (Page 2 of 2) of Commission Staff's Information Request from Informal Conference held on July 19, 2011, and relates to confidential information contained in the subject response that is entitled to protection pursuant to 807 KAR 5:001 Section 7 and KRS §61.878(1)(c)1 and §61.878(1)(c)2c.
- 2. The information designated as confidential in the subject Response describes reflects End Use Survey information from retail members of EKPC's member systems. The open disclosure of such information could allow competitors an unfair commercial advantage over EKPC and its member systems. As such this information is confidential and not subject to public disclosure pursuant to KRS §61.878(1)(c)1.
- 3. The subject information is also entitled to protection pursuant to KRS §61.878(1)(c)2c, as records generally recognized as confidential or proprietary which are

confidentially disclosed to an agency in conjunction with the regulation of a commercial enterprise.

4. Along with this Petition, EKPC has enclosed one copy of Response 1, Page 2 of 2, with the confidential information identified by highlighting or other designation, and 10 copies of the same exhibit, with the confidential information redacted. The identified confidential information is not known outside of EKPC and is distributed within EKPC only to persons with a need to use it for business purposes. It is entitled to confidential treatment pursuant to 807 KAR 5:001 Section 7 and the various sections of KRS 61.878 delineated above.

WHEREFORE, EKPC respectfully requests the Public Service Commission to grant confidential treatment to the identified information and deny public disclosure of said information.

Respectfully submitted,

Mark David Goss

Frost Brown Todd LLC

250 West Main Street, Suite 2800

Lexington, KY 40507-1749

(859) 231-000—Telephone

(859) 231-0011—Facsimile

Counsel for East Kentucky Power Cooperative, Inc.

CERTIFICATE OF SERVICE

This is to certify that an original and 10 copies of the foregoing Petition for Confidential Treatment of Information in the above-styled case were hand-delivered to the Office of Jeffrey Derouen, Executive Director of the Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601 on July 28, 2011.

Counsel for East Kentucky Power Cooperative, Inc.

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JUL 28 2011

PUBLIC SERVICE COMMISSION

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In	the	Matter	r of
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THE FILING OF NEW DEMAND SIDE)	
MANAGEMENT TARIFFS BY EAST KENTUCKY)	CASE NO.
POWER COOPERATIVE, INC. AND 11 OF ITS)	2011-00148
MEMBER DISTRIBUTION COOPERATIVES)	

RESPONSES OF EAST KENTUCKY POWER COOPERATIVE, INC. TO COMMISSION STAFF'S INFORMATION REQUEST FROM INFORMAL CONFERENCE HELD ON JULY 19, 2011

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

TN	J	THE	MA	ATTER	OF:

THE FILING OF NEW DEMAND SIDE)	
MANAGEMENT TARIFFS BY EAST KENTUCKY)	CASE NO.
POWER COOPERATIVE, INC. AND 11 OF ITS)	2011-00148
MEMBER DISTRIBUTION COOPERATIVES)	

CERTIFICATE

STATE OF KENTUCKY)
COUNTY OF CLARK)

David M. Crews, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff's Information Requests from the Informal Conference held on July 19, 2011 in the above referenced case, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Subscribed and sworn before me on this 28th day of July, 2011.

Notary / Public

MY COMMISSION EXPIRES NOVEMBER 30, 2013 NOTARY ID #409352

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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THE FILING OF NEW DEMAND SIDE)	
MANAGEMENT TARIFFS BY EAST KENTUCKY)	CASE NO.
POWER COOPERATIVE, INC. AND 11 OF ITS)	2011-00148
MEMBER DISTRIBUTION COOPERATIVES)	

CERTIFICATE

STATE OF KENTUCKY)
)
COUNTY OF SHELBY)

Debra J. Martin, being duly sworn, states that she has supervised the preparation of the responses of Shelby Energy Cooperative, Inc. to the Public Service Commission Staff's Information Requests from the Informal Conference held on July 19, 2011 in the above referenced case, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.

Subscribed and sworn before me on this <u>25</u> day of July, 2011.

Notary Public 15177C

Delva J. Martin

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2011-00148 DEMAND SIDE MANAGEMENT TARIFFS RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INFORMATION REQUEST FROM INFORMAL CONFERENCE HELD ON 07/19/11 REQUEST 1

RESPONSIBLE PARTY: David M. Crews

Request 1. Provide the electric furnace saturation data of EKPC member systems.

Response 1. The electric furnace saturation data of EKPC's member systems is provided on page 2 of this response.

			Electric Hea	ating Sys	tem Used l	Most Ofter	1
	Saturation of Electric Heat	Electric Furnace	Electric Heat Pump	Geo- thermal	ETS	Electric Built In Units	Portable Electric Heaters
Big Sandy							
Blue Grass							
Clark							
Cumberland Valley							
Farmers							
Fleming-Mason							
Grayson							
Inter-County							
Jackson							
Licking Valley							
Nolin	 						
Owen							
Salt River	e N						
Shelby	5. 6. 						
South Kentucky							
Taylor County				2. 13 B			
EKPC	59.1%	17.2%	30.6%	3.2%	0.9%	5.9%	1.2%
(weighted average)							

Note: Totals may not equal sum of components due to rounding.

Source: 2009 EKPC End Use Survey

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2011-00148 DEMAND SIDE MANAGEMENT TARIFFS RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INFORMATION REQUEST FROM INFORMAL CONFERENCE HELD ON 07/19/11 REQUEST 2

RESPONSIBLE PARTY: David M. Crews

Request 2. Provide the California test information for the Commercial & Industrial Advanced Lighting Program and Industrial Compressed Air Program.

Response 2. Cost/benefit information regarding the Commercial & Industrial Advanced Lighting Program is included on page 2 of this response. Cost/benefit information regarding the Industrial Compressed Air Program is included on page 3 of this response.

Commercial Lighting Including Advanced Measures/LED exit signs 2011

Distribution System Benefits		Distribution System Costs		
Power Bill Declines Rebates From EK	\$12,441,475 \$2,517,392	Revenue Declines Administrative Costs	(\$18,279,393) \$ 0	
		Rebates Paid To Consumers	(\$1,006,012)	
Total Benefits	\$14,958,867 	Total Costs	(\$19,285,405)	
	Benefit / Cost	Benefit / Cost Ratio: 0.78		

Participant Benefits		Participant Costs	
Electric Bill Declines Rebates From Distribution System Reductions in O&M costs	\$11,444,950 \$759,354 \$0	Up Front Investment	(\$3,917,668)
Total Benefits	\$12,204,304	Total Costs	(\$3,917,668)
	Benefit / Cost I	Ratio: 3,12	

efits	Total Resource Costs	
\$12,173,626 \$2,925,046 \$509,827 \$0	Up Front Customer Investment Distribution System Admin. Costs EK Administrative Costs	(\$5,037,052) \$0 (\$359,442)
\$15,608,499	Total Costs	(\$5,396,493)
	\$12,173,626 \$2,925,046 \$509,827 \$0 \$15,608,499	\$12,173,626 Up Front Customer Investment \$2,925,046 \$509,827 \$0 Up Front Customer Investment Distribution System Admin. Costs EK Administrative Costs

EK Benefits		EK Costs		
Avoided Energy Costs	\$12,173,626	Decrease In Revenue	(\$12,441,475)	
Avoided Gen Capacity Costs	\$2,925,046	Rebates Paid	(\$2,517,392)	
Avoided Transmission Expense	\$509,827	Administrative Costs	(\$359,442)	
Total Benefits	\$15,608,499	Total Costs	(\$15,318,309)	
	Benefit / Cost I	Ratio: 1.02		

Industrial Compressed Air Program 2011

Distribution System Benefits		Distribution System Costs		
Power Bill Declines Rebates From EK	\$20,086,726 \$2,523,279	Revenue Declines Administrative Costs Rebates Paid To Consumers	(\$30,759,569) (\$841,093) \$0	
Total Benefits	\$22,610,006	Total Costs	(\$31,600,662)	
	Benefit / Cost Ratio: 0.72			

Participant Benefits		Participant Costs	
Electric Bill Declines Rebates From Distribution System Reductions in O&M costs	\$19,434,455 \$0 \$0	Up Front Investment	(\$6,433,354)
Total Benefits	\$19,434,455	Total Costs	(\$6,433,354)
Γ	Benefit / Cost	Ratio: 3.02	

Total Resource Benefits		Total Resource Costs	
Avoided Energy Costs Avoided Gen Capacity Costs Avoided Transmission Expense	\$19,252,563 \$4,204,700 \$737,596	Up Front Customer Investment Distribution System Admin. Costs EK Administrative Costs	(\$8,523,077) (\$841,093) (\$215,665)
Reduced Customer O&M costs	\$0	EN Administrative Costs	(\$210,000)
Total Benefits	\$24,194,859	Total Costs	(\$9,579,835)
	Benefit / Cost I	Ratio: 2.53	

EK Benefits		EK Costs	
Avoided Energy Costs Avoided Gen Capacity Costs Avoided Transmission Expense	\$19,252,563 \$4,204,700 \$737,596	Decrease In Revenue Rebates Paid Administrative Costs	(\$19,806,315) (\$2,523,279) (\$215,665)
Total Benefits	\$24,194,859	Total Costs	(\$22,545,259)
	Benefit / Cost I	Ratio: 1.07	

EAST KENTUCKY POWER COOPERATIVE, INC. PSC CASE NO. 2011-00148 DEMAND SIDE MANAGEMENT TARIFFS RESPONSE TO INFORMATION REQUEST

COMMISSION STAFF'S INFORMATION REQUEST FROM INFORMAL CONFERENCE HELD ON 07/19/11 REQUEST 3

RESPONSIBLE PARTY: Debra J. Martin

Request 3. Why is Shelby Energy Cooperative's ("Shelby") tariff filing for the Advanced Lighting Program tariff different from East Kentucky Power Cooperative ("EKPC") and the other member cooperative tariffs?

Response 3. Shelby decided to simplify the tariff and make it more easily understood on the exact amount of eligible rebate for commercial and industrial members. As provided in EKPC's tariff, the rebate for a commercial member is limited to \$15,000 for each upgrade and for an industrial member; the rebate is limited to \$30,000 per upgrade. A statement is provided in the EKPC tariff that the limit is the "(total of both customer and distribution system rebates)". However, we thought our version of the tariff better clarified the eligible amount to the commercial or industrial member by stating it exactly and avoiding possible confusion.

The amount of the total rebate to a Shelby commercial and industrial member was calculated by taking the entire incentive paid by EKPC for each kW of load reduction to the end customer of \$213 and to the member cooperative for lost revenue in the amount \$320 which

totaled \$533 paid for each kW of load reduction on Shelby's system. The rebate limit for a commercial account of \$15,000 per upgrade was then divided by the total kW incentive of \$533 resulting in a maximum of 28 kW reduction for a commercial member in the amount of approximately \$6,000. The same process was used for the industrial upgrade limit of \$30,000 which was divided by \$533 and resulted in a maximum of 56 kW reduction for a rebate of \$12,000.